

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MICHELLE GORE,

Plaintiff,

v.

NEW PRIME, INC., ACE  
AMERICAN INSURANCE  
COMPANY, and TYLER LEE  
COOPER,

Defendants.

Civil Action File No. \_\_\_\_\_

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**DEFENDANT ACE AMERICAN INSURANCE COMPANY'S  
CERTIFICATE OF INTERESTED PERSONS AND CORPORATE  
DISCLOSURE STATEMENT**

(1) The undersigned counsel of record for a party to this action certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

- a. New Prime, Inc.;
- b. ACE American Insurance Company; and
- c. Tyler Lee Cooper.

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

- a. Other than individuals and entities who are parties to this case, there are no other persons, associations, firms, partnerships, or corporations known to Defendants which either have a financial interest in this litigation or other interest which could be substantially affected.

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

- a. Elizabeth L. Bentley, Swift Currie McGhee & Hiers, LLP; and,
- b. Thomas Rainey, Esq., Morgan and Morgan.
- c.

This 14th day of April, 2023.

*(Signature on following page)*

Respectfully submitted,  
**SWIFT, CURRIE, McGHEE & HIERS, LLP**

*/s/ Elizabeth L. Bentley*

By: \_\_\_\_\_

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

**Swift, Currie, McGhee & Hiers, LLP**

1420 Peachtree Street NE, Suite 800

Atlanta, Georgia 30309

(404) 874-8800 Phone / (404) 888-6199 Fax

[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)

*Attorneys for Defendants*

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within and foregoing **Defendant ACE American's Certificate of Interested Persons and Corporate Disclosure Statement** by filing same with the Clerk of Court using the CM/ECF (Pacer) system which will automatically send an electronic copy of same to all parties and counsel of record as follows:

Thomas Rainey, Esq.  
MORGAN & MORGAN ATLANTA PLLC  
PO Box 57007  
Atlanta, GA 30343  
[trainey@forthepeople.com](mailto:trainey@forthepeople.com)

*Attorneys for the Plaintiff*

This 14<sup>th</sup> day of April, 2023.

*/s/ Elizabeth L. Bentley*

By: \_\_\_\_\_

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

**SWIFT, CURRIE McGHEE & HIERS, LLP**  
4857-0248-2781, v. 1